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Chief, Standardization Branch
Livestock and Seed, AMS, USDA

RE: United States Standards for Livestock and Meat Marketing Claims

The Illinois Beef Association has an area of concern with the "Preconditioning Claims" section of the document (*Animals for which a preconditioning claim is made must receive the following treatments (as appropriate) at least 45 days prior to their sale/shipment:...*). While this definition is workable, the science associated with calf health does not support the 45 day minimum. The Health Action Team of the Five State Beef Initiative (21 partner organizations including 5 Land Grant Universities, 5 beef cattle associations, 5 state departments of agriculture, 5 state Farm Bureaus, and a livestock marketing coop that services this region) has spent considerable time and effort evaluating the scientific literature and developing a sound, science-based guideline for preconditioning calves from our 5 state region. While we acknowledge that a preconditioning period of 45 days might be advisable from a cow-calf producer profit standpoint (total weight gain), it is not needed from a calf health perspective. The science says that if calves are weaned 30 days, dewormed, vaccinated, bunk and water broke, and revaccinated for the viral components of the respiratory complex (IBR, PI3, BVD, and BRSV), with the final vaccination coming at least 14 days before shipment, the immune response of these calves is primed and ready for a challenge (marketing, transport, starting on feed, etc.). This calf in fact is more immunologically competent than a 45 day preconditioned calf as described that is only vaccinated once. Additionally, the calves should be castrated, dehorned and healed before shipment. Again, 30 days is adequate from a calf health perspective. While we acknowledge that 45 days is what some pharmaceutical companies and states across the country are recommending, this should not be considered the minimum requirement for the entire nation. Regions of the country do differ in the vaccinations and time required for optimal animal immunity to be established. In our region of the country, the highly successful preconditioning CPH program established in Kentucky, the Illinois Green tag program, and the 5 State Beef Initiative program all support and require a minimum preconditioning period of 30 days based on the science. The feedlot morbidity and mortality data from these programs support the 30-day requirement. It is our contention that the types of vaccinations used, geographic region of the country, plane of nutrition, and mineral status of the animal are significantly more important than the minimum 45 day period described in the Federal Register. We highly recommend the change be made to a minimum of 30 days instead of 45 days. Each program can then indicate "X" days if they choose to distinguish a longer preconditioning program if they choose.

The second area of concern comes from the "Aged Meat Claims" section (*Must be wet aged for a minimum of 21 days or dry aged for a minimum of 35 days.*) . We are in complete agreement that aging time needs to be defined if it is a label claim, but the minimum time requirements are different for wet (21 day) vs. dry aging (35 day). Based on the science, tenderness approaches its optimum in 14 days and this has been the benchmark time for much of the tenderness research in this country. Additionally, the science says that in the case of dry aging (carcass), that the unique flavor is achieved somewhere between day 5 to 7 and that additional dry aging (carcass) to 14 days does increase tenderness. In Indiana we have over 100 small processors that custom harvest and market animals direct to consumers (freezer beef). Historically, at the farm level, producers have allowed their own farm raised beef to dry age (carcass) for 10-14 days. The only place where dry aging for over 21 days comes into play is at a select few restaurants that purchase vacuum packaged (primal, subprimal) product, open the vacuum package upon receipt, and then dry age the product on a shelf in a temperature and moisture controlled environment for some specified time. It should be noted that this type of dry aging causes significant shrink losses and also causes what some people call an "earthy" taste. The science does not fit the ages described in the Federal Register. To leave the aging language (21 and 35 days), as stated in the Federal Register would eliminate the competitive advantage that small processors and small producers, that are engaged in marketing a unique freezer beef product directly to consumers, have over beef products marketed by the large retail and mega-mart organizations. We highly recommend that the age restriction be lowered to 14 days for carcass aging (dry), 14 days for wet aging, and make some distinction between carcass and wholesale cut dry aging. If some group or organization wishes to extend that aging process, it can be stated by indicating "X" days.

Thank you for your consideration of these comments.